

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NATIONAL SALVAGE & SERVICE CORPORATION,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 22-1428-GBW
)	
SULLA VALLEY BIOGAS, SA DE C.V. and HONDURAN GREEN POWER CORPORATION,)	JURY TRIAL DEMANDED
)	
)	
Defendants.)	

AFFIDAVIT OF CHRISTOPHER FITZPATRICK CANNATARO, ESQ.

STATE OF DELAWARE)	
)	SS:
COUNTY OF NEW CASTLE)	

I, Christopher Fitzpatrick Cannataro, duly sworn, depose and say:

1. I am an associate at the law firm of Abrams & Bayliss LLP, counsel for plaintiff National Salvage & Service Corporation (“NSSC”) in the above-captioned action. The facts set forth in this affidavit are based on my personal knowledge.

2. On October 28, 2022, NSSC filed the complaint. D.I. 1.

3. The complaint named as defendants Sulla Valley Biogas, SA de C.V. (“Sulla Valley”) and Honduran Green Power Corporation (“HGPC”).

4. I certify under penalty of perjury, that we have exercised our due diligence and researched service of process in Honduras to confirm that service via international mail, return receipt requested is an acceptable means of service upon the last known addresses for Sulla Valley and HGPC. *See, e.g., Quinn Emanuel Urquhart & Sullivan, LLP v. Rosenthal-Hidalgo*, No. 1:19-CV-01331 (CJN), 2020 WL 7386320, at *2 (D.D.C. July 24, 2020) (finding “that

service by mail is not prohibited by Honduran law”); *TracFone Wireless, Inc. v. Distelec Distribuciones Electronicas, S.A. de CV*, 268 F.R.D. 687, 691 (S.D. Fla. 2010) (same).

[remainder of page intentionally left blank]

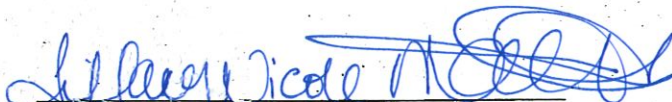


Christopher Fitzpatrick Cannataro (#6621)
ABRAMS & BAYLISS LLP
20 Montchanin Road, Suite 200
Wilmington, Delaware 19807
(302) 778-1000

*Counsel for Plaintiff National Salvage &
Service Corporation*

SWORN AND SUBSCRIBED before me

this 8th day of November, 2022.


Notary Public

TIFFANY NICOLE MATTHEWS
NOTARY PUBLIC
STATE OF DELAWARE
My Commission Expires August 12, 2024